245288 245290

Time:

----Original Message----

From: Pamela Greenlaw [mailto:pmlgrnlw@yahoo.com]

Sent: Tuesday, July 16, 2013 3:06 PM

To: Jocelyn.Boyd

Cc: Chad Burgess; David Odell; Flitter, John; Libby Smith; Edwards, Nanette; Hudson, Shannon,

timika.shafeek-horton@duke-energyprogress.com; brian.franklin@duke-energyprogress.com;

bholman@selcsc.org; matthew.gissendanner@scana.com

Subject: Request for extension for Dockets 2005-385-E qne 2005-386-E

The Honorable Ms. Boyd,

Please find attached and embedded my very pertinent and reasonable letter of request.

In addtion, please make clear to me to whom email and snail mail copies should go. The labels list on the PSC and or ORS site is incomplete and contains errors. I believe Mr. Odell is not longer working for SunStore, as I have had to use a different email address for him. Mr. Melvin Jenkins has appeared on some communications from ORS and not on others. Ruth Thomas's home address has changed; subsequently, notices mailed to her are likely being returned to their sources. I would be glad to forward her updated address to the Commission.

These errors are excusable; however, I want to ensure I am doing my best to keep clear communications with those to whom regulations bind me and the Commission.

Sincerely,

Pamela Greenlaw

KeceiaeD

JUL 16 2013

PSC SC MAIL / DMS

2452 SS 1001 Wotan Road Columbia, SC 29229 July 15, 2013 245290

The Honorable Jocelyn Boyd
Chief Clerk and Administer
Public Service Commission
101 Executive Center Drive
Columbia, South Carolina 29210

RECEIVED

JUL 16 2013

PSC SC MAIL / DMS

RE: Order No. 2013-238 and Petition of Regulatory Staff to Establish Dockets to consider Implementation of the Requirements of Section 1251 (Net Metering and Additional Standards) of the Energy Policy Act Of 2005, Docket Number 2005-385-E

Dear Ms. Boyd,

The purpose of this letter is two-fold.

First, I request, and in fairness for all other parties and stakeholders in the above-referenced dockets, an extension of the time for submission of prefiled testimony by ten (10) business days from the original deadline date August 7 to August 21.

Since the Commission determined not to use the allowable ex parte or a hearing format but a workshop format, there are no clear guidelines to follow. Lacking a clear understanding of the logistics of a workshop format, I do not know how to prepare.

As the purpose of the Commission in these two dockets is to assess the progress of the net metering and smart metering programs of the IOU's, the underlined language indicates the Commission's desire to use a system of review that would best serve the interests and benefits to both the public and the IOU's. To that end the Commission stated in Order # 2013-345, May 22, 2013, Commission Action lines 8-12 "Further with regard to a method for reviewing the two Dockets, I [Commissioner Howard] move that we allow the parties in the dockets and <u>any other interested persons and/or organizations to request</u> allowable *ex parte* proceedings. The electrical utilities will be scheduled initially, followed by <u>any other requesting entities deemed appropriate</u> by this Commission pursuant to South Carolina Code Annotated Section 58-3-260" (my underlining.)

The phrases underlined indicate the Commission's desire to include appropriate persons, organizations, and entities who can bring relevant and pertinent information to the fore in the direct presentation of evidence and in providing responses to others' testimony. Solar and net metering professionals and their organizations that were not parties in the original dockets could qualify as "requesting entities deemed appropriate by this Commission's intent in Order # 2013-345 regardless of the format that was chosen.

The nature of participation of qualifying stakeholders, in particular solar providers, will inform both the testimony and the form of presentation I and any others would plan. Will these other stakeholders (deemed appropriate by the Commission) be allowed and/or encouraged to make their own presentations? OR should they act as witnesses for the parties of record and prepare testimony? OR will they be permitted to perform as tag-team participants alongside the recognized parties of record? I need this information so I can prepare properly and up to the Commissioners' expectations. This information is needed by other prospective stakeholder/participants.

Second, I am recommending some format suggestions for the Commissioners to plan and conduct the workshop that would allow free exchange of ideas:

- create with the presenters an outline of issues to ensure all aspects of issues of the dockets are adequately covered
- hold a 4-part process whereby 1. each presenter makes an initial presentation, 2. Commissioners' questions, 3. panel discussion during which time presenters and witnesses or tag-team participants may speak to the Commissioners about one another's points, 4. Wrap-up –final "arguments" and noting points of agreement on information by the parties and presenters.
- Allow a tag-team format for presenters and stakeholders deemed appropriate by the Commission

I wish to thank the Commissioners in their wisdom for opening up the process to a more transparent and less adversarial one. The freer exchange of ideas and information will improve the economy, add to the resiliency of the utilities and the grid, make fairer through enlarging choice for ratepayers, and lay a better path for South Carolina's energy future.

Please inform me and all of the parties as to the following:

- the definition of "entities deemed appropriate by the Commission"
- whether any of these entities may still be allowed to request direct participation on their own
- how these entities can participate in the process whether as possible tag-team members or as witnesses or as stand-alone presenters
- how these entities will receive communication from the Commission about its decision
- that you approve the extension of time for the purpose of appropriate preparation

By copy of this letter, I am alerting each of the following parties of record via first class mail through the US Postal Service.

Feel free to contact me if you have concerns or questions.

Sincerely,

Pamela Greenlaw

Cc:

Shannon Hudson,

Nanette Edwards, Esquire;

John Flitter;

David O'Dell;

Elizabeth Smith;

Ruth Thomas

Mel Jenkins;

J. Blan Holman

K. Chad Burgess

Timika Shafee-Horton

Matthew Gissendanner

Brian Franklin